



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

**77 WEST JACKSON BOULEVARD**

**CHICAGO, IL 60604-3590**

**JUL 13 2011**

REPLY TO THE ATTENTION OF:

Andrew Stewart  
Chief  
Permits and Stationary Source Modeling Section  
Bureau of Air Management  
Wisconsin Department of Natural Resources  
P.O. Box 7921  
Madison, Wisconsin 53707-7921

The U.S. Environmental Protection Agency has received your letter regarding Wisconsin Rapids Grain, Blair West and Blair East facilities located in the city of Blair, Wisconsin. Your May 9, 2011, letter, requests confirmation from the EPA Region 5 that the two facilities belong to a single source in relation to air pollution control permitting.

The Wisconsin Department of Natural Resources (WDNR) has a federally approved State Implementation Plan (SIP). WDNR has made a determination that the two facilities, which are both owned and operated by Wisconsin Rapids Grain, meet the criteria necessary to determine a single source classification exists.

The Prevention of Significant Deterioration (PSD) regulations at 40 CFR 52.21(b)(5) and (6) and the Title V regulations at 40 CFR 70.2 define a "stationary source" as any building, structure, facility, or installation that belong to the same industrial grouping, are located on contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Furthermore, according to the preamble to the August 7, 1980, final PSD regulations, "...one source classification encompasses both primary and support facilities, even when the latter includes units with a different two digit SIC code.

The SIP approved regulations within Wisconsin's state statutes also contain a definition of "stationary source". The regulations provide that a "stationary source" is; "...any facility, building, structure or installation that directly or indirectly emits or may emit an air contaminant only from a fixed location. A stationary source includes an air contaminant source that is capable of being transported to a different location. A stationary source may consist of one or more pieces of process equipment, each of which is capable of emitting an air contaminant. A stationary source does not include a motor vehicle or equipment which is capable of emitting an air contaminant while moving." (Wisconsin Statutes Chapter 285.01(41))

EPA Region 5 has reviewed the letter and facts provided. We are in agreement with WDNR that the Blair West and Blair East facilities constitute a single stationary source for air permitting requirements.

If you have any questions or concerns regarding these comments, please contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Blakley". The signature is written in dark ink and is positioned above the printed name and title.

Pamela Blakley  
Chief  
Air Permits Section